

STOKES
BARTHOLOMEW
EVANS & PETREE

ATTORNEYS AT LAW

A PROFESSIONAL ASSOCIATION

NASHVILLE • MEMPHIS • MUSIC ROW

424 CHURCH STREET, SUITE 2800
NASHVILLE, TENNESSEE 37219-2386

(615) 259-1450 • FAX: (615) 259-1470
www.stokesbartholomew.com

GUILFORD F. THORNTON, JR.
gthornton@stokesbartholomew.com

RECEIVED

2003 NOV 17 PM 4:19

T.R.A. DOCKET ROOM

Direct Dial: 615/259-1492
Direct Fax: 615/687-1507

November 17, 2003

The Honorable Deborah Taylor Tate, Chairman
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37243

RE: Workshop to Gather Information from the Telecommunications Industry Related
to Preventing Violations of Tenn. Code Ann. 65-21-114

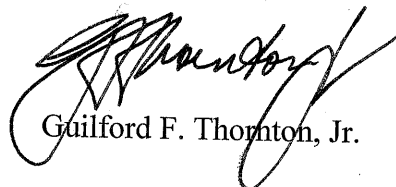
Docket No. 03-00502

Dear Chairman Tate:

I am enclosing with this letter an original and thirteen copies of Citizens Telecommunications Company's comments following the industry workshop conducted by Director Ron Jones in this docket on Friday, November 7, 2003.

Should you have any questions or require anything further at this time, please do not hesitate to contact me.

Sincerely,



Guilford F. Thornton, Jr.

cc: Mike Swatts
Gregg Sayre

**BEFORE THE TENNESSEE REGULATORY AUTHORITY
NASHVILLE TENNESSEE**

**IN RE: WORKSHOP TO GATHER INFORMATION FROM THE
TELECOMMUNICATIONS INDUSTRY RELATED TO PREVENTING
VIOLATIONS OF TENN. CODE ANN. 65-21-114.**

DOCKET NO. 03-00502

COMMENTS

Citizens Telecommunications Company of the Volunteer State and Citizens Telecommunications Co. of Tennessee (collectively referred to herein as "Citizens"), pursuant to the Notice filed by Director Ron Jones, respectfully submit these comments following the industry workshop held Friday, November 7, 2003.

1. Frontier is in compliance with TCA 65-4-114, the County Wide Calling ("CWC") statute to the extent possible. In order to fully comply, the local service provider of the originating and terminating number as well as the IXC carrying the call must share a common data base. Without this three-way cooperative relationship, no party in TN can be in full compliance with the CWC statute.

2. It is not rational or feasible for those currently using the TAR database to change to another database. The vast majority of companies currently use the TAR database. It is tested and proven to work, it is available at no expense to all parties, and it has been the industry standard since the implementation of CWC.

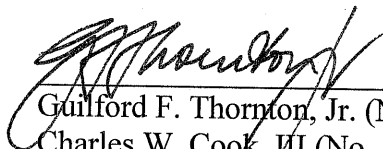
3. If the TAR database is mandated for all parties, it appears it would be possible for BellSouth to develop an automated means of calculating access credits associated with carriers' zero rating countywide calls. If everyone participated in the TAR database Bellsouth would be assured that all access credits are legitimate. This

would eliminate some of the frustration some companies face in trying to calculate the amount of access credit due them.

4. Citizens questions the claim by those using the GeoCode database that it allows them to zero rate intracounty calls for their customers. For example, if Time Warner has customers in County A, it may be true that they have all of their customer locations and county codes loaded in the GeoCode database. However, if Citizens has an NXX in neighboring County B and some of the service territory for that NXX spills over in County A, then Time Warner has no way to determine which Frontier customers are in County A. Frontier would have to populate the GeoCode database with that information. Therefore, the claim by some CLECs at the workshop that their customers are not charged for intracounty calls is in error.

5. It appears there may be some problems with intracounty calls that transit the Telecommunications Relay Service (TRS) center. Since that type of call actually terminates at the TRS center and then is originated again to its final destination, it appears the proper scrub against the TAR database is not taking place. Citizens has found instances where our end users calling the TRS are being billed for intracounty calls. Citizens is discussing this problem with MCI who operates the TRS center.

Respectfully submitted,



Guilford F. Thornton, Jr. (No. 14508)

Charles W. Cook, III (No. 14274)

STOKES BARTHOLOMEW

EVANS & PETREE, PA.

424 Church Street, Suite 2800

Nashville, Tennessee 37219

(615) 259-1450

Attorneys for Citizens Telecommunications
Company of Tennessee, LLC